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August 21, 2020

Hon. William H. Pauley III
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Martin Avalo*, 16 Cr. 108 (WHP)

Dear Judge Pauley:

I am writing to request *nunc pro tunc* CJA re-assignment to this case, to which I was originally appointed in March of 2016.

In preparing Mr. Avalo's motion for compassionate release—which I believed to be prudent and time-sensitive in light of the rapid spread of COVID-19, the high number of inmate deaths in the BOP system, and Mr. Avalo's documented chronic medical conditions—my office expended approximately 35 hours of time. Rather than filing a "supplemental" voucher, I have recently been advised that the standard practice with respect to billing for compassionate release motions and other post-sentencing matters is to formally request CJA reappointment.

Therefore, I am specifically requesting CJA reappointment, *nunc pro tunc* to April 16, 2020, for a maximum of 35 hours—with the understanding that in the future I will request reappointment from the Court before beginning work on any other matters relating to previously-billed cases.

Application granted.

Respectfully submitted,

SO ORDERED:

/s/

David S. Greenfield


WILLIAM H. PAULEY III
U.S.D.J.

August 24, 2020